



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

April 5, 1982

Mr. Brian W. Buck
Environmental Coordinator
Getty Oil Company
P. O. Box 7900
Salt Lake City, Utah 84107

RE: Mercur Canyon Project
Modification
ACT/045/013
Tooele County, Utah

Dear Mr. Buck:

The Division has reviewed the recent submission concerning the proposed development and expanded surface disturbance at the Mercur Canyon Project. Several areas of improvement have required that additional information be supplied before further review may continue. Following is a list of the Division's initial concerns for Getty's response:

1. The updated redesigned tailings dam specifications and dimensions along with current drainage designs and diversion channel locations should be submitted to the Division along with an approval letter for the dam from the Division of Water Rights.
2. Specific tailings-dam-area ground water monitoring station designs mentioned in recent telephone communications between yourself and Thomas Tetting should be submitted for insertion into the Mining and Reclamation Plan (MRP).
3. Please locate the vegetation test plots indicated on page 2-47 of the original MRP on an appropriate map.
4. Getty Minerals Resources Company should provide figures giving the acreage of current areas stripped or to be stripped of topsoil and subsequently recovered. These figures may be tabulated in a percentage form (e.g., 25 acres stripped 20 acres, 80 percent to be recovered). A comparison with the figures submitted in the letter received at the Division's offices April 5, 1982, should be presented in a table.

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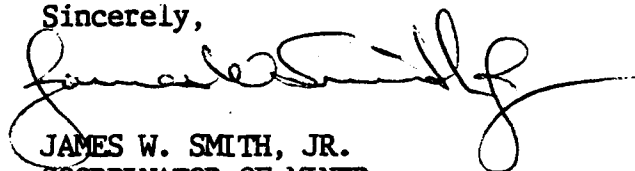
5. Is the approximate figure of 120 acres of waste dump correct when tabulating the acreage that will not be respread with topsoil?
6. To aid in determining eventual success for revegetation of the waste dump (because of a lack of topsoil availability), the Division recommends that a toxicity analysis of the material to be dumped be performed. In consultation with staff members of the Division, appropriate parameters for sampling should be developed. A copy of the completed analysis should be forwarded to the Division for further recommendations.
7. Areas indicated on the recently supplied map were unclear as to their purpose--what/where are the lower grade ore storage areas? Are they the same as Dump #1? Is there to be a segregated difference from the overburden storage areas? Are all the areas that are outlined, but unmarked, to be considered waste dumps or low grade storage, or both?
8. Has any ground water been encountered during 1981 development drilling? In light of the commitment made in the letter of May 14, 1981, where is the 1981 Drilling Report and Summarization? Also, please supply the 1981 Annual Operations and Progress Report requested in a letter dated March 10, 1982, sent to Edward Kropp.
9. The minimum number of years during which time the Division will maintain the surety arrangement is 10 years based upon an extension of operations for one additional year. The total inflated amount is \$3,133,496.

After responses to these areas of concern have been supplied and adequate material assessed, the Division will be in a better position to issue a decision regarding approval of the modification.

As discussed in conversations between Thomas Tetting and yourself, it may become necessary to make the new amendment available for public comment and to approach the Board for a decision concerning the increase in surety amount. Appropriate initial inquiries are being made as to the most proper avenues to proceed.

Please contact Thomas Tetting with any questions you may have regarding the status of the Division's review.

Sincerely,



JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT